AN EXAMINATION UNDER SECTION 212

OF THE PLANNING ACT 2008 (AS AMENDED)

REPORT ON THE DRAFT WELWYN HATFIELD BOROUGH COUNCIL

COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE

Independent Examiner (appointed by the Council): Keith Holland BA(Hons) DipTP MRTPI ARICS

Charging Schedule Submitted for Examination: 24 October 2024

Public Hearing: 9 December 2024

Date of Report: 15 January 2025

Main Findings - Executive Summary

In this report I have concluded that the Draft Welwyn Hatfield Borough Council Community Infrastructure Levy Charging Schedule provides an appropriate basis for the collection of the levy in the area.

The Council has provided sufficient evidence that shows the proposed rates would not threaten delivery of the Local Plan.

Introduction

1. I have been appointed by Welwyn Hatfield Borough Council ('the Council'), the charging authority, to examine the Draft Welwyn Hatfield Community Infrastructure Levy (CIL) Charging Schedule. I am a chartered town planner and surveyor with more than 50 years' experience including 25 years' inspecting and examining Development Plans and CIL Charging Schedules as a Government Planning Inspector.

2. This report contains my assessment of the Charging Schedule in terms of compliance with the requirements in Part 11 of the Planning Act 2008 as amended ('the Act') and the Community Infrastructure Regulations 2010 as amended ('the Regulations')[1]. Section 212(4) of the Act terms these collectively as the "drafting requirements". I have also had regard to the National Planning Policy Framework (NPPF)[2] and the CIL section of the Planning Practice Guidance (PPG).[3]

3. To comply with the relevant legislation, the submitted Charging Schedule must strike what appears to the charging authority to be an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across the borough. The PPG states[4] that the examiner should establish that:

    - the charging authority has complied with the legislative requirements set out in the Act and the Regulations;

[1] The Regulations have been updated through numerous statutory instruments since 2010, most notably through t

[2] The examination was substantially conducted with reference to the December 2023 version of the NPPF. A revised version of the NPPF was published on 12 December 2024 albeit, for example, in relation to Development contributions the terms of paragraph 35 (formerly paragraph 34) remain unchanged.

[3] The CIL section of the PPG was substantially updated on 1 September 2019, and most recently updated 26 April 2024. At the time of completion of the examination, no further updates have been made to the CIL section of the PPG following publication of the December 2024 NPPF.

[4] See PPG Reference ID:

- the draft charging schedule is supported by background documents containing appropriate available evidence;

- the charging authority has undertaken an appropriate level of consultation;

- the proposed rate or rates are informed by, and consistent with, the evidence on viability across the charging authority's area; and

- evidence has been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see NPPF paragraph 34[5]).

4. The basis for the examination, on which a hearing session was held on 9 December 2024, is the submitted Draft Charging Schedule of August 2024 which is a revised version of the Draft Charging Schedule of January 2024.[6]

5. In summary, the Council proposes a matrix approach involving three residential zones. For residential development above the affordable housing threshold (excluding retirement and extra care housing) the proposed charges per square metre (sq. m) are £100 in Zone 1, £140 in Zone 2 and £230 in Zone 3. The zones are shown in the schedule. For residential development below the affordable housing threshold the figure is £230 per sq. m in all three zones. Three strategic housing sites are listed (Birchall Garden Suburb, Broadwater Road West and North West Hatfield) where the proposed charge would be nil. A nil rate is also proposed for development by publicly funded or "not for profit" organisations involving medical, health, and emergency services, development for education purposes (school, college or institute of higher education) and community, sport and leisure facilities. Changes of use to a defined Main Town Centre Use would also attract a nil charge. All other uses would be subject to a £20 charge per sq. m.

Has the charging authority complied with the legislative requirements set out in the Act and the Regulations, including undertaking an appropriate level of consultation?

6. The Council consulted on a Preliminary Draft Charging Schedule in May/June 2017 and a Draft Charging Schedule in September/November 2020. These schedules were not progressed because of delays in the Local Plan process. Following the adoption of the Local Plan in October 2023 the Draft Charging Schedule was consulted on between 10 January and 24 February 2024. The consultation included publicity on the Council's website, notification to those on the planning policy database and hard copies of the documents went to the County Council, the town and parish councils and the neighbouring authorities. Thirty-two responses were received to this consultation. Following the consultation, three modifications were made by the Council to

[5] Paragraph 35 of the NPPF December 2024.
[6] View the submission and examination documents at: https://www.welhat.gov.uk/planning-applications/planning-obligations

the schedule and these were subject to a further round of consultation between 2 August and 2 September 2024. Broadly the same consultation procedures were used with the addition of emails to previous respondents and potential consultees, public press notices and the deposit of hard copies in all libraries in the Borough. The Draft Charging Schedule that is being examined is the schedule of January 2024 as amended in August 2024.

7. The Charging Schedule complies with the Act and the Regulations, including in respect of the statutory processes and public consultation, consistency with the adopted Local Plan and the Infrastructure Delivery Plan, and is supported by an adequate financial appraisal. I also consider it compliant with the national policy and guidance contained in the NPPF and PPG respectively.

Is the draft charging schedule supported by background documents containing appropriate available evidence?

Infrastructure planning evidence

8. To support the Draft Charging Schedule, the Council produced an Infrastructure Funding Gap Assessment based on the adopted Local Plan and other infrastructure evidence. The Welwyn Hatfield Local Plan 2016 – 2036 (LP) was formally adopted In October 2023. The LP sets a housing requirement of 15,200 new homes for the plan period. An Infrastructure Delivery Plan (IDP) was published alongside the submission of the LP in 2017. This delivery plan was periodically updated as the LP examination progressed. Recently, Hertfordshire County Council produced provisional updated figures for infrastructure costs including projects not identified in the IDP. Excluding the provisional County Council figures the best up-to-date estimate of expected infrastructure costs for the LP period is just over £343 million. There is confirmed funding of a little under £10 million leaving a substantial funding gap of over £335 million. If the County Council provisional figures are included the gap grows to almost £500 million. The Council anticipates a CIL income of around £41 million. Clearly a CIL can be justified.

Economic viability evidence

9. The Council has commissioned a number of viability studies. BNP Paribas Real Estate (BNPPRE) prepared viability evidence for the 2017 Preliminary Draft CIL Charging Schedule which built on earlier work including the Welwyn Hatfield Combined Policy Viability Update of August 2016. In 2016 BNPPRE also tested the viability of four strategic development sites. In 2020 the CIL viability evidence was updated and this work was then superseded by the current viability appraisal (VA) dated October 2023.[7]

10. For residential development the appraisal uses 13 typologies ranging from one house to a one thousand house/flats scheme. The typologies reflect the

[7] Welwyn Hatfield Community Infrastructure Levy Viability Study October 2023.

type of development that has historically taken place in the area. Unit sizes are based on nationally described space standards published in 2015. For sales values a variety of sources are used including the Land Registry, Rightmove and new homes marketing websites. Developments in the Borough attract average sales values of ranging from about £4,844 to £6,781 per sq. m with the highest values in the northern and southern rural villages and the lower values in and around Hatfield. Although the BNPPRE analysis is based on five different value areas the VA noted that the Council may wish to combine areas to simplify the Charging Schedule. (Paragraph 6.23 of the VA). The Council decided to use three charging zones. The grouping of the five areas into three zones relates to BNPPRE's calculation of the maximum CIL chargeable in the five value areas.

11. Possible future values have been tested on the basis of cumulative growth in values of 21.1% and 10.4% in costs between 2023 and 2027. This scenario testing is for illustrative purposes and is not a decisive factor in BNPPRE's recommendations.

12. For affordable housing, account has been taken of the Council's Local Plan policy SP 7 and advice from the Council's Housing team regarding the split between Social Rented Housing and intermediate products. A discounted cashflow model as used by registered providers is applied to establish the capital value of rented properties. The viability study assumes that rented housing is let at rents that do not exceed the relevant Local Housing Allowance caps. Nil grant funding is another assumption.

13. The Council expects the majority of housing development in the Borough to be built on green field sites. The appraisal notes that benchmark values for such sites is usually in the range of 10 to 15 times agricultural value. Using data from research by MHCLG, Savills, and Strutt and Parker the VA tests benchmark values from £250,000 to £400,000 per gross hectare.

14. Values for open and residential land within towns and settlements can vary significantly and accordingly the VA has relied on a broad assumption of £500,000 per gross hectare for such land. Lower value industrial sites are also a potential source of land for residential development. The VA assesses the capital value based on a 1-hectare site on the basis of rental value, an allowance for refurbishment and a letting void/rent-free period of 2.5 years. A premium of 20% is added to the resulting £1.973 million capital value to obtain a benchmark value of £2.170 million.

15. As regards commercial development, the typologies tested reflect a range of use classes at average rent levels achieved in actual developments. The tested typologies are offices, science park lab enabled offices, industrial and warehouses, supermarkets and retail warehousing, other retail, hotels and student accommodation. The assumed yields are based on Knight Frank prime yield schedules and comparable evidence. Benchmark values for existing commercial sites are tested and other than for student accommodation, three possible current or existing uses are assessed. For redevelopment sites intensification of use is assumed. Lower rents and

higher yields are assumed for existing space and refurbishment costs are allowed for. A 20% premium over existing use values has been applied.

16. Turning to build costs, guidance is provided by WT Partnership (WTP) alongside the RICS Building Cost Information Service ('BCIS') database. This firm has advised the Council on numerous viability assessments related to planning applications and the Local Plan. The build costs used by BNPPRE in their assessment include an additional 10% for external works and a contingency of 5%. Other additional allowances including demolition and site preparation costs, policy driven costs, sustainability related costs and achieving BREEAM Excellent standard are allowed for. Costs relating to accessibility standards based on the *MHCLG Housing Standards Review: Cost Impacts* are taken into account. As appropriate, costs associated with self-build and custom housebuilding and biodiversity net gain are taken into account.

17. A full range of usual costs including marketing, professional fees and acquisition/purchasers' costs are included in the VA. The S106 cost of £3,500 per unit for residential schemes that is adopted is based on allowances secured by the Council over the last three years. For commercial schemes, the evidence is less clear and a notional £20 per sq. m has been applied. For residential developments a sales rate of 4 units per month is used. This is based on relatively weak market conditions.

18. Developer's profit used in the VA follows conventional lines. For private residential developments, the assumption used is 17.5% of Gross Development Value (GDV) while for affordable housing development it is 6%. For commercial development the developers' profit is assumed to be 15% of GDV.

19. Exceptional costs are not allowed for as BNPPRE reasonably assume that any such costs would be reflected in the price paid for the land as required by the viability section of the PPG.

20. The Draft Charging Schedule is supported by evidence of community infrastructure needs and a comprehensive assessment in general terms of the relevant factors that need to be taken into account when considering the viability of various forms of development in the Borough. On this basis, the evidence which has been used to inform the Charging Schedule is comprehensive, proportionate and appropriate.

Are the proposed rates informed by and consistent with the evidence on viability across the charging authority's area?

Residential development

21. The VA details the maximum CIL rates that could be applied to the typologies tested taking into account the varying levels of affordable housing, four benchmark levels and five broad locations. Given these varying inputs it is not surprising that the analysis by BNPPRE shows a wide variation in the

maximum CIL rates that could be charged. As one would expect, BNPPRE note that national guidance expects a viability buffer to be provided. BNPPRE also note that most councils set CIL rates that are no more than 5% of development costs with viability buffers of 20 – 50%. BNPPRE recommend that in the Borough the viability buffer should be around 30%.

22. For conventional residential development, BNPPRE concludes that for all sites under the Council's affordable housing threshold the maximum CIL rate is £325 per sq. m and recommend a rate £228 per sq. m. For sites over the threshold, the lowest maximum rate indicated by the VA is £150 per sq. m in South Hatfield, Hatfield and Birchwood. The highest maximum rate as assessed by BNPPRE is £325 per sq. m in two broad areas – firstly Welwyn, Oaklands, Mardley Heath and Digswell and secondly, Brookman's Park, Little Health, Cuffley, Essendon and the surrounding rural area. For the areas with the lowest potential CIL rate, the recommended rate is £105 per sq. m and for the highest it is £228 per sq. m. Other parts of the Borough could support a maximum CIL of £200 per sq. m without a viability buffer and £140 per sq. m with the recommended buffer.

23. For retirement housing BNPPRE considered a 40-unit scheme. BNPPRE note the factors, including floorspace ratios, sales rates and sales values that give retirement housing and extra-care housing different viability results compared to conventional housing. The conclusion in the VA is that viability in both these forms of development is challenging. Hence, the recommendation is that a nil or nominal rate be applied to these forms of housing. The same conclusion is reached in relation to student housing.

Commercial rate

24. In terms of commercial development, the VA deals with office uses, including science park related offices, supermarkets/superstores/retail warehousing, all other retail, industrial/warehousing and hotels. For all these types of development the evidence is that none of them are likely to generate residual land values that justify anything other than a nominal CIL charge.

Has evidence been provided that shows the proposed rate or rates would not undermine the deliverability of the plan (see National Planning Policy Framework paragraph 34[8]).

25. A number of those making representations consider that the CIL should be set at a very much higher level because of the substantial need for additional infrastructure in the Borough. There is also the view from some that the CIL charge should be set at a level that ensures that all the infrastructure needs arising from a specific development are met by the charge. While these views are understandable there is no realistic prospect that the CIL could be set at a level to satisfy these demands without undermining the viability of development in the area and/or adversely impacting the delivery of other Local Plan policies. The CIL legislation does not envisage that the levy will

[8] Paragraph 35 of the NPPF December 2024.

meet all infrastructure requirements or relate to a specific development proposal. The local authority is expected to strike a balance between the need for infrastructure and viability considerations. A CIL is thus seen as part of the solution rather than the whole solution.

26. Three development sites, Birchall Garden Suburb, Broadwater Road West and North West Hatfield, have been identified by the Council as strategic sites where infrastructure can best be delivered through S106 agreements. These sites would have a nil CIL charge. This is an acceptable approach for major development sites that have exceptional infrastructure requirements that can most effectively be delivered through site specific legal agreements.

27. Several representations challenge the proposals on the grounds that the typologies chosen do not reflect developments that are currently being progressed in the area. The use of typologies is the usual approach used in CIL work and inevitably means that there will not be a precise match between the typologies and specific projects. The important point is that the typologies should be based on an informed assessment of the type of development that has occurred, and is likely to occur in the future, in the context of the Local Plan for the area. In this instance, BNPPRE has based the typologies on the view of the Council taking into account applications over the last 5 years and the anticipated form of development in the light of the adopted Local Plan.

28. Aurora Properties Limited argue that the three charging zones are crudely drawn and do not make geographic or economic sense. This representation references the settlement hierarchy in Welwyn Hatfield as defined in the Local Plan and contends that it is irrational for Zones 2 and 3 to contain large areas of rural land. Aurora Properties Limited's first representation proposed that Hatfield should be in Zone 1, all other urban areas excluded from the Green Belt in Zone 2 and the rural areas, including washed over Green Belt villages, in Zone 3 with a lower CIL rate than the rate in Zone 2. The justification put forward in the representation for the lower Zone 3 rate is the lower value of property, additional infrastructure cost and reduced sustainability in the more remote parts of the Borough.

29. Residential sales values are an important consideration when assessing viability in relation to CIL rate setting. The BNPPRE work concludes that in general the higher residential values are achieved in the northern and southern rural villages/hamlets. There is a conflict between the evidence in the VA and the robust assertions made by Aurora Properties Limited. BNPPRE figures are based on actual property transactions and prices being sought for properties on the market. As the Council point out in their written response to the representations from Aurora Properties Limited, the representations do not provide any quantitative evidence that supports their contention that the highest average residential sales values used in the VA work only apply to the most exclusive areas in Brookmans Park and Cuffley.

30. The second representation from Aurora Properties Limited suggests that the large villages in Zone 3 should be defined as a specific CIL zone with the

larger rural area outside the established towns and large villages charged at a lower rate. This representation argues that the Zone 1 rate per sq. m should be increased from £100 to £140, Zone 2 rate increased from £140 to £175 and the Zone 3 rate decreased from £230 to £200. For the broad rural area the representation favours them either being put in Zone 2 or in a new zone with a rate under £200 per sq. m. One of the difficulties with this argument is that it would almost completely eliminate a viability buffer in Zones 1 and 2. In relation to Zone 3 the viability evidence provided by BNPPRE conflicts with the argument that the rural parts of the area should benefit from a lower rate than the larger villages in Zone 3. Introducing a bespoke rate for the large villages in Zone 3 and a different rate for the rural areas would make the Charging Schedule unnecessarily complicated and cannot be justified, particularly as the anticipated quantum of residential development in the rural areas is extremely small. When considering the distribution of housing growth, the Local Plan identifies zero capacity for housing allocations in what is described as the Rural North and the possibility of an allocation/s for four dwellings in the Rural South. In the Rural North six dwellings were completed between 2016 and 2023, while in the Rural South the comparable figure was forty-nine.

31. Aurora Properties Limited contends that there is an irrational disconnect in the VA between residential sales values with a range of 40% and the proposed CIL rates with a range of 130%. The relationship between the CIL and sales values is more complicated than this objection implies. While residential sales values are important, the residual valuation approach that is the basis for the recommended CIL has a number of components that have to be taken into account. Deciding on an appropriate CIL is more complex than simply relating percentage CIL rate variations to the percentage range in residential sales values. Aurora Properties Limited also challenge the way the five residential value areas have been grouped into three CIL zones. Looking at the average residential sales values set out in Table 4.5.1 of the VA, an arguable case can be made against the grouping. However, the grouping decided on by the Council is based not on average residential values but on BNPPRE's view of the maximum CIL rate that is feasible in each of the five areas (Table 6.21.1 of the VA). On this basis the grouping is logical and is supported by BNPPRE.

32. In relation to build costs, representations from Aurora Properties Limited and others claim that the build cost figures used in the VA are unrealistically low. Aurora Properties Limited say the build cost figures are some 10 years out of date. None of the other representations take such an extreme view although some have other reservations, for example whether it is appropriate to use the same base build cost regardless of typology. Aurora Properties Limited claim that their figures are based on their recent experience and are supported by Gleeds, a firm of Chartered Quantity Surveyors. No quantitative evidence is provided by Aurora Properties Limited to substantiate their claim that in the Southeast the appropriate figures are £3,230 - £3,770 per sq. m including external works.

33. For build costs BNPPRE has relied on data from WT Partnership who are

extensively used by the Council in relation to site specific assessments in relation to planning applications. For houses the BNPPRE figure including external works but before policy costs are added is £2,169 per sq. m. Support for the approach taken by BNPPRE is provided by CDM Project Services (CDM) who provided the Council with cost advice in 2021 and claim to base their benchmark costs on BCIS and evidence from over 300 projects in the Southeast and Greater London. BNPPRE has updated the 2021 figures to October 2023 using BCIS and indexation at a rate of 16%. CDM has also referenced Gleeds who they say have provided them with their cost information over a number of years. CDM refers to an example of a near-by high quality retirement village where base cost figures (4th quarter 2023) provided by Gleeds were £2,064 per sq. m for cottages and £2,309 per sq. m for bungalows. CDM advised that high quality detached houses in sought after areas with high sales values may cost more than the average, but that they would not expect a base cost of over £2,500 per sq. m.

34. BNPPRE have undertaken sensitivity testing allowing for a base build cost of £2,500 per sq. m. This testing, which is intended for illustrative purposes, demonstrates that at this build cost level viability could only be sustained in high specification developments in high value areas. The conclusions reached by BNPPRE are consistent with the views of CDM. In relation to base build costs the evidence provided by BNPPRE and CDM is more substantial and convincing than that provided in the representations made by various parties.

35. Some of the representations argue that the use of a 17.5% profit on residential GDV is too low. A 17.5% on GDV profit margin is frequently used in CIL viability studies. None of the representations arguing for a higher rate provide a convincing argument showing that the risks involved in residential development in Welwyn Hatfield justify a higher profit margin. Nor do they provide any other justification for a higher margin.

36. BNPPRE has assumed that development finance can be provided at a rate of 6.5%. Some challenge this figure but development finance is not tied to bank base rates in the way mortgages are and a figure of 6.5% is not unreasonably low given the timescales involved in development finance arrangements.

37. Some objectors consider that the S106 cost assumptions made by BNPPRE are unrealistically low. The BNPPRE assumptions are based on evidence of what has been secured by the Council in the last three years. For CIL viability work the use of such evidence is well founded. Clearly some S106 agreements are likely to involve higher figures but the use of historic data is reasonable. It should also be noted that in future, S106 agreements will be negotiated in the context of a CIL being in place. It is reasonable to expect the average S106 agreement to be lower as a result of the CIL. There are several representations that relate to significant applications that are currently being processed by the Councill or are awaiting S106 agreements. Understandably these representations are concerned that the introduction of a CIL should not add a new cost to the proposed development. The Council

point out that it is not the intention to add a CIL without an appropriate adjustment being made regarding the quantum of any S106 agreement.

38. The deliverability of the three strategic sites identified will not be affected by the proposed CIL as the intention is that the significant amount of infrastructure required to develop these sites will be provided through S106 agreements. This is not an unusual approach for strategic sites. There is a request that the Panshanger site should also be treated as a nil rated strategic site. One part of this site has permission, and a second has a resolution to grant permission subject to a S106 agreement, so assuming that this is agreed prior to the implementation of CIL neither will be subject to a CIL charge. The developers are concerned that a S73 application is needed to resolve compatibility issues and a further "drop in" application is needed for a third area of residential development. The concern is that the "drop in" application could attract a high CIL charge. The Council dispute the CIL figure put forward in the representation, argue that discussions with the developers are on-going and say that it is not certain that a "drop in" application will be needed. In the light of the existing permissions and the on-going discussions, I accept the Council's view that it would be inappropriate to treat this as a nil rated strategic site. In the event that a "drop in" application attracts a CIL charge, it will be necessary for the Council to take this into account when considering any S106 agreement.

39. There are some representations that relate to the way the CIL will be administered. These are matters that are not relevant to this examination.

40. For uses not specified in the Draft Charging Schedule a rate of £20 per sq. m is proposed. The reasonable logic is that other than the specific nil rated forms of development, all development should make some contribution to infrastructure cost. A rate of £20 per sq. m is essentially a nominal rate that is unlikely to affect delivery considerations as it is expected to represent less than 1% of development costs.

41. In setting the CIL charging rate the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the Borough of Welwyn Hatfield. In relation to residential schemes, the proposed charge would represent a modest amount of the overall development costs – typically less than 5% even in the zone with the highest proposed charge. A further consideration that supports the contention that the proposed CIL would not jeopardise the delivery of development is the intention of the Council that the CIL should largely replace the S106 contributions currently used in the absence of an adopted CIL. My overall conclusion is that the proposed CIL is set at an acceptable level based on reasonable assumptions about development values and likely costs. The Council has tried to be realistic in terms of achieving a reasonable level of income to address an acknowledged gap in infrastructure funding, while ensuring that a range of development remains viable across the authority area.

42. I consider the viability assessment to be robust and conclude that the residential rates proposed would not threaten delivery of the Local Plan. The proposed rates are justified.

Overall Conclusion

43. I conclude that the Draft Welwyn Hatfield Community Infrastructure Levy Charging Schedule satisfies the drafting requirements and I therefore recommend that the Draft Charging Schedule be approved.

44. For completeness, the Council has provided a short schedule of 'minor modifications' (annexed to this report) that are proposed for the purposes of factually updating the draft Charging Schedule, prior to adoption. I am content these are minor, non-material, changes that the Council may incorporate which do not need to be subject to a formal examiner recommendation.

Keith Holland

Examiner

Annex: Proposed Minor Modifications to the Draft Charging Schedule Submitted and Examined

Draft Charging Schedule Page	Paragraph	Proposed Modification	Reason for Change
Contents	Table of Contents	Replace Section 1 “How to Respond” with “Date of Commencement”.	Details on how to respond to the consultation no longer required, but an implementation date is.
	Table of Contents	Remove two instances of the word “Draft” before “Charging Schedule” in the heading of Section 3, and two instances of the word “Proposed” before “Charging Schedule” in the heading of section 4.	To prepare the charging schedule for future adoption
1	Heading	“Welwyn Hatfield CIL Draft Charging Schedule January 2024 (Revised August 2024)” to be replaced with “Welwyn Hatfield CIL Charging Schedule (Adopted [date to be inserted])” NB heading to be replaced in all subsequent pages as well	To prepare the charging schedule for future adoption
	Section 1 (paras 1.1 – 1.7) How to Respond	New paragraph 1.1 to say “This is Welwyn Hatfield Borough Council’s first Community Infrastructure Levy (CIL) Charging Schedule and following an examination, including a hearing on 09 December 2024, was adopted by the Council on [date to be inserted]”	As above
		New paragraph 1.2 to say “This CIL Charging Schedule will take effect on [date to be inserted]”	To clarify the implementation date for CIL
	2.3	Remove the word “draft” before “Charging Schedule” and remove “(previously consulted on in January 2024)”	To prepare the charging schedule for future adoption
	2.4	Remove the paragraph	The paragraph refers to changes to the draft schedule as a result of consultation.

2	Sub heading	Remove the word “draft” before “Charging Schedule Evidence Base”	To reflect this is no longer a draft
	3.1	Remove the word “draft” before “Charging Schedule”	To reflect this is no longer a draft
	3.2	Replace the second half of the final sentence with “…is a background paper available on the Council’s website”.	To update the position
	3.8	Replace the paragraph with “To inform the Community Infrastructure Levy examination a partial review of the costs identified in the IDP was undertaken and this identified that a significant funding gap was present. This Infrastructure Funding Gap Assessment is available on the Council’s website”	To update the position
	3.9	Replace the paragraph with “The Council is working on a new Local Plan and intends to submit this for examination by October 2026. A revised Infrastructure Delivery Plan will be produced to support this submission”.	To update the position
	3.10	Delete paragraph	No longer required
4	Sub heading and 4.1	Remove the words “Proposed” and “Draft” before “Charging Schedule”, and remove of the word “Proposed” in the heading for Tale 1	To prepare the charging schedule for future adoption
	4.2	Remove of the word “Proposed” in the second sentence. In the third sentence, the word “Proposes” to be replaced with “identifies”	To prepare the charging schedule for future adoption
	4.3 – 4.6	Replace the word “proposed” in each paragraph with “identified”	To prepare the charging schedule for future adoption